

State Water Resources Control Board

November 20, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7018 0680 0000 1017 5116

Mr. Robert King
Airport Manager
California City Municipal Airport
22636 Airport Way, Box #8
California City, California 93505
airportmgr@californiacity.com

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT CALIFORNIA CITY MUNICIPAL AIRPORT, 22636 AIRPORT
WAY, CALIFORNIA CITY**

Dear Mr. King:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on October 31, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Tag Monitoring Equipment – The automatic tank gauge (ATG) for the single-walled tank systems were missing the monitoring system certification tags for the most recent monitoring system certification performed on February 23, 2018.	AvGas 1&2	October 31, 2018	Ongoing	23 CCR 2641(j),
2	Failure to Perform Overfill Prevention Inspection – The overfill prevention inspection demonstrating overfill equipment will activate at the required level was due on October 13, 2018.	AvGas 1&2	October 13, 2018	Ongoing	23 CCR 2665(b)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Monitor Product Piping – The sensors located in the under-dispenser containment were unable to detect a leak at the earliest opportunity because the sensors were not positioned in a true vertical orientation.	AvGas 1&2	October 31, 2018	Ongoing	23 CCR 2641(a)
4	Failure to Maintain Owner/Operator Agreement – In CERS, the tank operator is listed as Robert King and the tank owner is listed as the City of California City. Since the permit is issued to the facility owner, and the owner is not the operator, an owner/operator agreement is required.	AvGas 1&2	October 31, 2018	Ongoing	H&SC 28284(a)(3); 23 CCR 2620(b)
5	Failure to Maintain Tank Information – In CERS, under vent, vapor recovery, and riser/fill pipe construction, the striker plate/bottom protector is blank. By December 22, 1998, all tank owners were required to install striker plates. A drop tube mounted bottom protector may fulfill this requirement.	AvGas 1&2	October 31, 2018	Ongoing	23 CCR 2662(d), 2711(a)
6	Failure to Maintain Tank Information – In CERS, under tank construction, the single-walled tanks are reported to have a fiberglass secondary containment.	AvGas 1&2	October 31, 2018	Ongoing	23 CCR 2711(a)
7	Failure to Maintain Tank Information – In CERS, under recordkeeping, ATG testing is blank; however, it should be marked “yes.”	AvGas 1&2	October 31, 2018	Ongoing	23 CCR 2711(a)
8	Failure to Maintain Monitoring Plan – In CERS, under the pipe monitoring section the line leak detector (LLD) section reports to have both mechanical and electronic LLDs; however, mechanical LLDs were observed at time of inspection.	AvGas 1&2	October 31, 2018	Ongoing	H&SC 25286(a); 23 CCR 2641(h), 2711(a)(9)

No.	Violation	Tank	Start Date	Stop Date	Regulation
9	Failure to Maintain Monitoring or Testing Records – The March 7, 2016 request for reconsideration letter to perform enhanced leak detection testing was not available at the time of inspection. At least 36 months of monitoring and maintenance records are required to be maintained on site.	AvGas 1&2	October 31, 2018	November 8, 2018	H&SC 25293; 23 CCR 2712(b)
10	Failure to Monitor Tank – The Veeder-Root TLS monitoring system is programmed to perform weekly 0.2 gph leak tests on the single-walled USTs. The following months had invalid test results due to low fuel volumes in each tank: March 2018, April 2018, and May 2018.	AvGas 1&2	March 1, 2018	May 31, 2018	H&SC 25292; 23 CCR 2641(a), 2641(j), and 2643(b)(1)
11	Failure to Monitor Tank – The Veeder-Root TLS monitoring system is programmed to perform weekly 0.2 gph leak tests on the single-walled USTs. The following months had invalid test results due to low fuel volumes in each tank: December 2017 and January 2018.	AvGas 1&2	December 1, 2017	January 31, 2018	H&SC 25292; 23 CCR 2641(a), 2641(j), and 2643(b)(1)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Kern County Public Health Services Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violation has been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Will Speth
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
will.speth@waterboards.ca.gov

Local CUPA

Mr. Bilal Korin
Supervising Environmental Health Specialist
Kern County Public Health Services
Department
2700 M Street, Suite 300
Bakersfield, California 93301-2370
korinb@kerncounty.com

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5891, or by email at matthew.buffleben@waterboards.ca.gov.

Sincerely,



Dr. Matthew Buffleben
Supervising Water Resources Control Engineer
Acting Supervisor, UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Bilal Korin
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Kern County Public Health Services Department
korinb@kerncounty.com

Ms. Elizabeth King
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Mr. Craig Platt
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